

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

IOENGINE, LLC,	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 18-452 (WCB)
	)	
PAYPAL HOLDINGS, INC.,	)	
	)	
Defendant.	)	

**STIPULATION AND [PROPOSED] ORDER STAYING ALL DEADLINES**

WHEREAS, the parties have reached an agreement in principle to resolve all matters in controversy; and

WHEREAS, the parties agree that a 30-day stay of all deadlines will preserve judicial and party resources and will allow the parties to finalize their agreement and prepare appropriate dismissal papers;

IT IS HEREBY STIPULATED by the parties, subject to the approval of the Court, that all case deadlines are stayed through October 2, 2025.

SMITH, KATZENSTEIN & JENKINS LLP

*/s/ Neal C. Belgam*

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September 2, 2025

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SO ORDERED this \_\_\_\_ day of September, 2025.

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Hon. William Curtis Bryson, U.S.D.C.J.